UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE

NASHVILLE DIVISION		conditioned upon the	
			timely filing of a waiver
UNITED STATES OF AMERICA)		of speedy trial.
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v.)	No. 3:14-00040 JUDGE TRAUGER	Otto a any

Motion GRANTED

MOTION TO CONTINUE JULY 8 TRIAL

JAMIE LYNNE HALL

Through counsel, defendant Jamie Lynne Hall moves to continue her July 8, 2014 trial and to extend the time for filing pretrial motions. Ms. Hall is released on bond pending trial and resides and works in Kentucky.

AND EXTEND TIME FOR FILING PRETRIAL MOTIONS

In support of this motion, Ms. Hall would show the following: The government has produced discovery. Counsel has made arrangements to meet with Ms. Hall during the week of June 30 to review the discovery together and to discuss potential research and investigation. Until this review and investigation is completed, counsel cannot determine the need for filing pretrial motions, and Ms. Hall cannot make a knowing or intelligent determination as to how she should proceed.

Ms. Hall concurs in the request for a continuance, and will be signing and filing a speedy trial waiver.

Counsel has advised Assistant U.S. Attorney Hal McDonough that she likely would seek a continuance, and Mr. McDonough did not indicate any objections.

For the reasons stated above, Ms. Hall asks the Court to continue this trial and to extend the time for filing pretrial motions until 28 days before any new trial date.